

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 04-30175-KPN
	)	
\$35,000 IN UNITED STATES	)	
CURRENCY,	)	
Defendant.	)	
	)	
-----	)	
JOSEPH GUILBE,	)	
Claimant.	)	

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1**

The parties, the United States of America, and Joseph Guilbe, by their undersigned counsel, submit this joint statement pursuant to Local Rule 16.1.

1. The parties have conferred pursuant to the Local Rules.
2. The parties confirm their obligation to limit discovery set forth in Fed.R.Civ.P. 26(b).
3. The parties propose the following schedule for discovery events and the filing of pre-trial motions:
  - a. initial discovery, as directed by Local Rule 26(a), to be produced by January 31, 2005;
  - b. discovery, including interrogatories and document requests, and any necessary depositions to be completed by May 31, 2005;
  - c. dispositive motions to be filed on or before July 1, 2005;
  - d. opposition to dispositive motions to be filed on

or before July 15, 2005.

4. The parties request that the Court then schedule a hearing on dispositive motions, or act upon the motions without hearing if the Court decides no hearing is necessary. If the case is not disposed of by motion, the parties will confer and then seek an additional Scheduling Conference with respect to further conduct of the case.

5. The parties consent to trial by magistrate judge.

Respectfully submitted,

MICHAEL J. SULLIVAN,  
United States Attorney

JOSEPH GUILBE,  
by his attorney

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Date: December 29, 2004

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